

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOINT CIVIL ACTION NO. 04-10579 JLT

KRISTIN GABEL,

Plaintiff,

v.

RIVERVIEW SCHOOL, AUDRICK J. HAYES,
STEVEN GRINSELL, AND MAUREEN BRENNER,

Defendant.

JOINT MOTION TO STAY PROCEEDINGS

All parties to this action move the Court to stay proceedings for ninety (90) days from allowance of this motion in order to permit the parties to conduct a voluntary mediation, and engage in informal discovery, in an effort to resolve this matter.

In support of their motion, the parties state as follows:

1. This is an action in negligence, negligent infliction of emotional distress, and breach of contract brought by a former student of Defendant Riverview School, Inc., in connection with allegations of sexual molestation.
2. Plaintiff commenced her action in March of 2004 and served Defendants in mid-July of 2004. The Court has noticed a scheduling conference for November 2, 2004.
3. All parties have agreed to participate in a mediation intended to settle this action. In advance of this mediation, the parties have further agreed to engage in informal discovery by way of exchange of relevant documents. The parties believe that mediation offers a reasonable prospect of settling this action. The parties have further agreed to jointly select a mediator.

4. In order to permit the parties to engage in such efforts without the needless duplication of time and resources, all parties request a stay of proceedings for ninety (90) days.

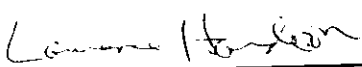
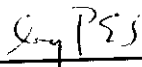
5. A stay will prejudice no party, and will promote the interests of judicial economy. If this effort to mediate results in settlement, the Court need not expend judicial resources in this matter.

WHEREFORE, all parties jointly move this Court to stay proceedings for ninety (90) days from allowance of this motion.

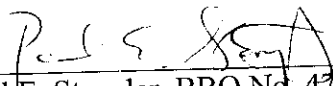
Respectfully submitted,

PLAINTIFF,
KRISTEN GABEL,
By Her Attorney,

DEFENDANTS,
RIVERVIEW SCHOOL, INC.,
STEVEN GRINSELL, MAUREEN
BRENNER,
By Their Attorney,

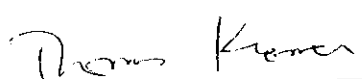
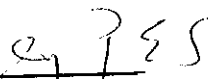
 

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By His Attorney,

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Dated: September 30, 2004